

Writer's Direct Dial: (516) 663-6554
 Writer's Direct Fax: (516) 663-6754
 Writer's Direct E-mail: jschlossberg@rmfpc.com

RMF

RUSKIN MOSCOU FALTISCHEK P.C.

Counselors at Law

Parties are to advise the
 Court by 2/23/11 (noon)
 what discovery
 has taken place.

SO ORDERED:

Date: February 17, 2011

2/17/11

Richard M. Berman
 Richard M. Berman, U.S.D.J.

By FedEx

Hon. Richard M. Berman
 United States District Court
 Southern District of New York
 United States Courthouse – Foley Square
 500 Pearl Street, Courtroom 21B
 New York, New York 10007

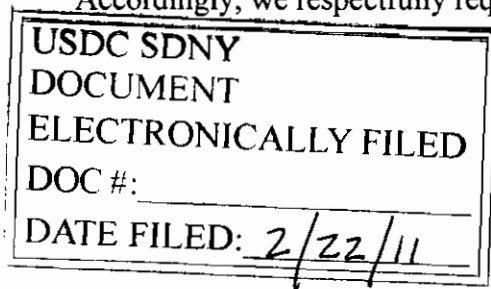
MEMO ENDORSED

Re: *Singh v. Air India and Swissport USA, Inc.*, 10-CV-6532 (RMB)

Dear Judge Berman:

We represent defendant Air India in the above-referenced action. The current discovery cut-off is March 4, 2011. On consent of all parties, the parties jointly request a 60-day extension of the discovery cut-off. This is the first request for such extension. The request is necessitated by certain delays the most significant of which can be attributed to difficulty in obtaining medical records from plaintiff's medical providers. The parties have agreed to tentative dates for depositions in March and April if the Court approves this request. Counsel are prepared to attend the currently scheduled conference on March 9 although all agree that it would be premature at this time to bring principals.

Accordingly, we respectfully request a 60-day extension of the discovery cut-off date.



Respectfully submitted,

Jeffrey M. Schlossberg
 Jeffrey M. Schlossberg
 For the Firm

JMS:sbs

cc: Laurence J. Lebowitz, Esq. (by email)
 J. Gregory Lahr, Esq. (by email)

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